



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

CMP/AMC  
F. #2011R01474

271 Cadman Plaza East  
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November 9, 2011

VIA ECF

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Re: United States v. Walters, et al.  
Criminal Docket No. 11-683 (NG)

Dear Counsel:

By this letter, the government discloses discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure. Please also consider this letter to be the government's request for reciprocal discovery.

The following discovery exhibits are available at First Choice Copy, (718) 381-1480. You may order copies of these discovery exhibits by calling First Choice Copy and referencing print order number **60086**.

<b>Discovery Exhibit Number</b>	<b>Description</b>
32	CD containing records for Wendell Walters from the following financial institutions and companies: American Express, BMW Financial Services, Bank of America, Capital One, Chase Bank, Washington Mutual, Geico, HSBC Mortgage and Progressive
33	CD containing TD Bank records for E.W. Strivers LLC
34	CD containing Capital One and Marathon Bank records for 4 Wave LLC
35	CD containing Chase Bank records for Stevenson Dunn, Lexington Avenue LP, Hancock Street SML LLC, 334 Marcus Garvey Blvd. Corp. and various related entities
36	DVD containing Chase Bank and Citibank records for Lee Hymowitz, Michael Freeman, Hymowitz & Freeman and various related entities and individuals
37	DVD containing Banco Popular and Chase Bank records for Sergio Benitez and various related entities
38	CD containing Chase Bank records for Robert Morales, PRA Building Materials, Alexander Avenue Associates and various related entities
39	CD containing Atlantic Bank and New York Commercial Bank records for MCR Restoration Corp.
40	CD containing Banco Popular records for John Doe #2 and Metropolis Development Corp.
41	CD containing federal wire transfer information for Hancock Street SML LLC, Alexander Cluster Inc., Cooper & Decatur Street, Inc., and Hymowitz & Freeman

The government will continue to provide any additional documents, objects and other discovery within the scope of Fed. R. Crim. P. 16 as they become available.

If you have any questions, please contact the undersigned.

Sincerely,

LORETTA E. LYNCH  
UNITED STATES ATTORNEY

/s/ Cristina M. Posa  
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cc: Clerk of the Court (NG) via ECF